

**Exhibit B-16**  
**WPAY-FM Channel 281C Portsmouth, Ohio**  
**Allocation Study**

The attached spacing study shows that the proposed operation meets the co-channel and adjacent channel spacing requirements for Class C stations as prescribed in §73.207 of the Commission's Rules, with the exception of short-spacings to four stations: WCBJ 279A Campton, WXKQ 280A Whitesburg, WCKQ 281C3 Campbellsville, and WNLT 282A Harrison. Processing pursuant to §73.215 of the Commission's Rules is requested with respect to each of these four stations, and the attached allocation map exhibits are included to demonstrate the lack of prohibited contour overlap.

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

FM Database Date: 030207

Channel: 281C 104.1 MHz  
 Latitude: 38 25 8  
 Longitude: 83 7 53  
 Safety Zone: 32 km  
 Job Title: WPAY-FM PORTSMOUTH

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
WCBJ	CAMPTON		279A	4.100	37-39-03	197.6	89.43	95
LIC	KY BLH-990621KE		103.7	121.0	083-26-21		-5.57	SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 89 KM								
WWEL	LONDON		280A	2.550	37-08-30	210.7	164.52	165
CP	KY BPH-020222AAP		103.9	108.0	084-04-45		-0.48	SHORT
WWEL	LONDON		280A	4.400	37-08-28	210.7	164.57	165
LIC	KY BMLH-940714KZ		103.9	58.0	084-04-45		-0.43	SHORT
WXXQ-FM	WHITESBURG		280A	0.210	37-04-27	169.3	151.88	165
LIC	KY BLH-820722AJ		103.9	287.0	082-48-44		-13.12	SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 142 KM								
WXEG	BEAVERCREEK		280A	2.900	39-43-19	327.6	172.16	165
LIC	OH BLH-020823AAY		103.9	146.0	084-12-36	SS	7.16	CLOSE
WXEGaux	BEAVERCREEK		280A	1.900	39-43-19	327.6	172.16	0
CP	OH BXPB-020308ABG		103.9	108.0	084-12-36		0.00	AUX
W280CY	MALTA		280D	0.010	39-38-36	38.5	175.03	0
LIC	OH BLFT-980309TE		103.9	71.0	081-51-29		0.00	TRANS
W280CY	MCCONNELLSVILLE		280D	0.010	39-48-40	34.8	189.52	0
LIC	OH BLFT-960625TA		103.9	56.0	081-51-48		0.00	TRANS
WEGE	WESTERVILLE		280A	5.100	40-09-33	5.2	194.04	165
LIC	OH BLH-980825KC		103.9	106.0	082-55-23	SS	29.04	CLEAR
WEGE	WESTERVILLE		280A	5.300	40-09-33	5.2	194.04	165
APP	OH BPH-011221AAQ		103.9	106.0	082-55-23		29.04	CLEAR
WLBCaux	MUNCIE		281B	9.300	40-09-42	315.8	273.87	0
LIC	IN BLH-820318AC		104.1	72.0	085-22-41		0.00	AUX
WLBC-FM	MUNCIE		281B	41.000	40-09-40	315.8	273.88	274
LIC	IN BLH-990615KB		104.1	140.0	085-22-44		-0.12	SHORT
WCKQ	CAMPBELLSVILLE		281C3	17.000	37-20-07	239.2	231.21	237
LIC	KY BLH-950404KA		104.1	120.0	085-22-33	SS	-5.79	SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 226 KM								

SEARCH PARAMETERS

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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
WPAY-FM APP	PORTSMOUTH OH	BPH-021023ABC	281C 104.1	100.000 455.0	38-43-21 083-00-05	18.5	35.56 -254.44	290 SHORT
WPAY-FM LIC	PORTSMOUTH OH	BLH-890612KC	281C 104.1	100.000 305.0	38-43-20 083-00-05	18.5	35.53 -254.47	290 SHORT
WEZJ-FM CP	WILLIAMSBURG KY	BPH-020820AAE	282C3 104.3	6.200 200.0	36-44-43 084-11-24	206.9 SS	207.96 31.96	176 CLEAR
WNLT LIC	HARRISON OH	BLH-000410ABC	282A 104.3	5.200 100.0	39-13-34 084-42-59	303.7 SS	164.25 -0.75	165 SHORT
ABSOLUTE MINIMUM 73.215 SPACING = 142 KM								
W282AI LIC	PARKERSBURG WV	BLFT-010628ABX	282D 104.3	0.100 44.0	39-15-51 081-35-33	54.3	163.27 0.00	0 TRANS
WLKT LIC	LEXINGTON-FAYETTE KY	BLH-000217ABS	283C2 104.5	50.000 142.0	38-04-09 084-18-44	249.7 SS	110.42 5.42	105 CLOSE

===== END OF FM SPACING STUDY FOR CHANNEL 281 =====





